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VIA ECF

The Honorable James B. Clark III
United States Magistrate Judge
District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse 2 Federal Square
Newark, New Jersey 07102

Re: *United States v. Haghighat, et al.*, Crim. No. 25-339

Dear Judge Clark:

We represent Bruce Haghighat, whose initial appearance was before Your Honor on May 28, 2025. Following the hearing, an Order Setting Conditions of Release was entered by the Court. As part of the conditions in the Court's Order, Mr. Haghighat's travel is limited. See *Dkt 24*.

Mr. Haghighat is presently required to give two weeks' written notice to travel anywhere other than California, EDNY, SDNY. He is also permitted to travel to New Jersey for court appearances and related meetings with counsel. Mr. Haghighat has a business in New Jersey and customers in Massachusetts. He also has family in Massachusetts. As such, we respectfully move the Court to amend Mr. Haghighat's Conditions of release to add New Jersey and Massachusetts to the list of locations that would only require his prior notification to Probation.

The Government has no objection to our requested amendment. We have, for the convenience of the Court, provided a space below for Your Honor to "So Order" the relief requested, should you decide to do so. We pray the Court grant our request and thank you for your kind consideration.

Respectfully submitted,

s/ William F Coffield
William F Coffield

s/ Laina Lopez
Laina Lopez

Counsel for Bruce Haghighat

cc: All counsel of record via ECF

So Order:

Hon. James B. Clark III, U.S.M.J.